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Attorneys for Plaintiff, N.V.E. Inc.

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

N.V.E. INC.,

Plaintiff,

vs.

MICHAEL MARINO & MICHAEL MARINO
ENTERTAINMENT,

Defendants.

District Judge: Dennis M. Cavanaugh, USDJ
Magistrate Judge: Joseph A. Dickson, USMJ

Case No.: 2:13-cv-00364-DMC-JAD

Civil Action

**NOTICE OF MOTION FOR REMAND
TO STATE COURT**

**Motion Date: March 18, 2013 at 9:00 a.m.
Oral Argument Requested**

TO: Krenkel & Krenkel, LLC
David A. Krenkel, Esq.
107 Main Street
Allenhurst, New Jersey 07711
(732) 531-9300
Attorneys for Defendants

PLEASE TAKE NOTICE that on Monday, March 18, 2013 at 9:00 a.m., or as soon thereafter as counsel can be heard, the undersigned attorneys for Plaintiff N.V.E., Inc. shall move before Hon. Joseph A. Dickson, USMJ, at the Martin Luther King, Jr., Federal Building and U.S. Courthouse, 50 Walnut Street, Newark, New Jersey, for an Order remanding this action to the Superior Court of New Jersey, Law Division, Sussex County.

PLEASE TAKE FURTHER NOTICE that in support of the within motion, Plaintiff shall rely upon the letter brief, Certification of Anthony J. Davis, Esq., and proposed form of Order submitted herewith; and

PLEASE TAKE FURTHER NOTICE that at that time and place aforesaid, Plaintiff will request that the proposed form of Order submitted herewith be entered by the Court.

NICOLL DAVIS & SPINELLA LLP
Attorney for Plaintiff, N.V.E. Inc.

Dated: February 18, 2013

s/Anthony Davis/
ANTHONY J. DAVIS